

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

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| DEANNE WILLIAMS, | § | |
| PLAINTIFF | § | CIVIL ACTION NO. 3:12-CV-02835 |
| | § | CONSOLIDATED WITH |
| | § | CIVIL ACTION NO. 3:13-CV-01655 |
| | § | |
| | § | |
| VERSUS | § | JUDGE ROBERT G. JAMES |
| | § | |
| MONROE CITY SCHOOL BOARD, | § | MAG. JUDGE KAREN L. HAYES |
| DEFENDANT | § | |

MOTION FOR SUMMARY JUDGMENT

The defendant, the MONROE CITY SCHOOL BOARD (“MCSB”), moves this Court, pursuant to F.R.C.P. 56, to grant summary judgment, in the following respects.

1.

The defendant desires and is entitled to summary judgment in its favor, dismissing claims alleging violation of the Americans with Disabilities Act and parallel claims asserted under the Louisiana tort law, by refusing to grant reasonable worker place accommodations, engaging in retaliatory conduct, and performing other prohibited acts that are made the subject of the instant complaints.

2.

The plaintiffs further show that the pleadings, depositions and other exhibits on file show that there is no genuine issue as to any material fact identified in the Statement of Material Facts that are Not Genuinely in Dispute which is made a part of this filing and, therefore, the Monroe City School Board is entitled to summary judgment, as a matter of law.

WHEREFORE, Plaintiffs pray that summary judgment be granted as pled.

RESPECTFULLY SUBMITTED:

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BY: /s/ L. Douglas Lawrence
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Counsel for the Defendant/Mover

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

DEANNE WILLIAMS
PLAINTIFF,

VERSUS

MONROE CITY SCHOOL BOARD, ET AL
DEFENDANTS

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CIVIL ACTION NO. 3:12-cv-02835

JUDGE ROBERT G. JAMES

MAG. JUDGE KAREN L. HAYES

CERTIFICATE OF SERVICE

_____ A copy of the foregoing Motion for Summary Judgment, supporting memorandum, statement of material facts that are not genuinely in dispute and proposed order were served on plaintiff's counsel of record via the federal court's electronic filing system on this 25th day of April 2014.

BY: s/ L. Douglas Lawrence

L. Douglas Lawrence (No. 18636)